

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON**

UNITED STATES OF AMERICA

CASE NO. 3:15 CR 148

Plaintiff,

HONORABLE JUDGE ROSE

vs.

CONNIE APOSTELOS

**MOTION FOR EXTENSION
OF TIME TO FILE MOTIONS**

Defendant.

Now comes the Defendant, **CONNIE APOSTELOS**, by and through counsel, **RION, RION & RION, L.P.A., INC.**, and respectfully requests an extension of time to file motions on Defendant's behalf for the reason that there is additional discovery that has still not been provided to defense counsel. The discovery that has not been provided contains crucial information that needs to be reviewed by Defendant prior to the filing of any motions.

Wherefore, it is respectfully requested that Defendant be granted an extension of time for filing pre-trial motions for a period of time to be determined once all discovery has been turned over.

Respectfully Submitted,

S/ JON PAUL RION
JON PAUL RION (#0067020)
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing was sent to the Office of the United States Attorney on the same day of filing.

S/ JON PAUL RION
JON PAUL RION
RION, RION & RION, L.P.A., INC.